

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 WELLS FARGO BANK, N.A.,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-cv-01009-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTION TO DISMISS
AND OPPOSE COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT (ECF NOS. 29, 30)**

FIRST REQUEST

COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”) and
plaintiff Wells Fargo Bank National Association (“Wells Fargo”), by and through their respective
attorneys of record, which hereby agree and stipulate as follows:

1. On May 25, 2021, Wells Fargo filed its complaint in the Eighth Judicial District
Court for the State of Nevada;

2. On May 26, 2021, Fidelity removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);

3. On September 2, 2021, Fidelity moved to dismiss Wells Fargo's complaint (ECF No. 20);

4. On October 15, 2021, Wells Fargo opposed Fidelity's motion to dismiss (ECF No. 29) and filed a countermotion for partial summary judgment (ECF No. 30);

5. Counsel for Fidelity requests a 31-day extension of time for Fidelity to file its opposition to Wells Fargo's countermotion for partial summary judgment and a 45-day extension of Fidelity's deadline to reply in support of its motion to dismiss, such that both shall be due on Monday, December 6, 2021, to afford Fidelity's counsel additional time to review and respond to the arguments in Wells Fargo's opposition and countermotion.

6. Counsel for Wells Fargo does not oppose the requested extension;

7. This is the first request for an extension made by counsel for Fidelity, which is made in good faith and not for the purposes of delay.

//

//

//

//

//

//

//

//

//

//

//

//

//

//

1 **IT IS SO STIPULATED** that Fidelity's deadline to reply in support of its motion to
2 dismiss and oppose the countermotion for partial summary judgment are hereby extended through
3 and including Monday, December 6, 2021.

4 Dated: October 19, 2021

SINCLAIR BRAUN LLP

6 By: /s/-Kevin S. Sinclair
7 KEVIN S. SINCLAIR
8 Attorneys for Defendant
FIDELITY NATIONAL TITLE INSURANCE
COMPANY

9 Dated: October 19, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Dragon
12 LINDSAY D. DRAGON
13 Attorneys for Plaintiff
WELLS FARGO BANK NATIONAL
ASSOCIATION.

14 **IT IS SO ORDERED.**

15 Dated this 19th day of October, 2021.

16 
17 _____
18 RICHARD F. BOULWARE, II
19 UNITED STATES DISTRICT JUDGE
20
21
22
23
24
25
26
27
28